

IN THE DISTRICT COURT OF BUFFALO COUNTY, NEBRASKA

RYSTA LEONA SUSMAN, BOTH  
INDIVIDUALLY AND AS NATURAL  
MOTHER OF JACOB SUMMERS, A  
PROTECTED PERSON, JACOB SUMMERS,  
A PROTECTED PERSON BY AND  
THROUGH HIS TEMPORARY GUARDIAN  
AND CONSERVATOR, JOHN SAUDER, and  
JACOB SUMMERS,

Plaintiffs,

vs.

KEARNEY TOWING & REPAIR CENTER,  
INC., A NEBRASKA CORPORATION,

Defendant.

CI 19-0158

**PLAINTIFF JACOB SUMMERS  
RESPONSES TO DEFENDANT'S  
REQUEST FOR PRODUCTION OF  
DOCUMENTS**

TO: Kearney Towing & Repair Center, Inc and their counsel, Engles, Ketcham, Olson & Keith,  
P.C

**COMES NOW** Plaintiff, Jacob Summers, by and through his attorney of record, Kaster, Lynch, Farrar & Ball, LLP pursuant to the Nebraska Discovery Rules and responds to Defendant, Kearney Towing & Repair Center Inc. Request for Production of Documents as follows:

**REQUEST NO. 1:** True and accurate copies of all bills incurred by you for bodily injury as a result of the accident alleged in the Complaint.

**RESPONSE:** See enclosed payment summary.

**REQUEST NO. 2:** True and accurate copies of all medical records evidencing injuries you incurred as a result of the accident.

**RESPONSE:** See enclosed medical records.

**REQUEST NO. 3:** True and accurate copies of all statements in your possession from any witnesses or individuals alleged to have knowledge of facts relevant to the matters alleged in the Complaint.

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**RESPONSE:** Plaintiff objects to this request on the grounds of relevance.

**REQUEST NO. 25:** True and accurate copies of any documents relied upon to draft the Complaint.

**RESPONSE:** Plaintiff objects to this request as overly broad and fails to identify the documents sought with reasonable particularity, additionally Plaintiff asserts the work product privilege. Subject to and without waiving said objections see accident report and Kearney Tire invoices.

**REQUEST NO. 26:** True and accurate copies of any documents relied upon or referenced in your Answers to Interrogatories for this case.

**RESPONSE:** See accident report and medical records.

**REQUEST NO. 27:** True and accurate copies of any and all expert witness reports produced by you in support of the claims filed by you/on your behalf against Goodyear Tire Co.

**RESPONSE:** Plaintiff objects to this request as irrelevant to the facts at issue in this case. Any expert reports generated as a result of the case against Goodyear Tire Co were based on an entirely different set of allegations that have no relevance to the instant case. Furthermore, expert reports in the case against Goodyear Tire Co contain confidential information by the Order of Confidentiality that prevents its disclosure to any persons not directly related to the case said order was entered in.

**REQUEST NO. 28:** True and accurate copies of any and all written discovery responses you have issued in the case you filed against Goodyear Tire Co.

**RESPONSE:** See enclosed.